



Squire Patton Boggs (US) LLP
382 Springfield Ave, Suite 300
Summit, New Jersey 07901

O +1 973 848 5600
squirepattonboggs.com

Mark C. Errico
T +1 973 848 5668
mark.errico@squirepb.com

April 21, 2021

VIA ECF

Hon. Michael A. Hammer
United States Magistrate Judge
U.S. District Court, District of New Jersey
MLK Jr. Federal Bldg. & U.S. Courthouse
50 Walnut Street, Room MLK 2C
Newark, New Jersey 07102

Re: *Ali Karimi v. Deutsche Bank Aktiengesellschaft, et al.*,
Case No. 2:20-cv-08978-ES-MAH

Dear Magistrate Judge Hammer:

We represent the Defendants in the above-captioned action (the “Action”). We write in response to Your Honor’s April 21, 2021 Order (Dkt. No. 48) terminating Defendants’ motion to dismiss (Dkt. No. 42) without prejudice to Defendants’ right to file a combined motion to dismiss the Action and motion to transfer the Action pursuant to 28 U.S.C. § 1404(a).

Defendants respectfully request leave to file an oversized brief of 42 pages in 12-point Times New Roman font to fully address the bases for dismissal and transfer. Plaintiffs do not oppose Defendants’ request.

Respectfully submitted,

/s/ Mark C. Errico
Mark C. Errico

cc: All Counsel of Record (via ECF)